

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE **Patricia A. Brown, aka**
Patricia A. Tucker
Debtor

Chapter 13
: **BANKRUPTCY NO. 22-11904-amc**

**REPLY OF WINDRUSH TO RESPONSE OF DEBTOR TO MOTION OF WINDRUSH
HOMEOWNERS ASSOCIATION FOR RELIEF FROM AUTOMATIC STAY**

Movant, by its attorneys, Clemons Richter & Reiss, P.C., hereby replies to Debtor's response to Motion of Windrush Homeowners Association for Relief from the Automatic Stay:

11. No response required.

12. Admitted.

13. Denied. Exhibit "B" speaks for itself. The exact response of counsel for Debtor is as follows: *"Our office does not represent a Patricia A. Tucker on the claims asserted in your March 30th correspondence"*. Counsel's response does not reject the claim or otherwise advise Movant that Debtor is not the same Patricia A. Tucker who owns real estate in Windrush Homeowners Association, known as 1616 Rockcress Drive, Jamison, 18929.

14. Admitted that Debtor's address is as listed in the Petition. However, the mailing address of Debtor does not preclude Debtor from owning real estate in another county.

15. Denied. After reasonable investigation, Movant has insufficient information to admit or deny the allegation, it is accordingly denied.

16. Denied as a conclusion of law. By way of further response, Movant did not learn until Debtor's response to its Motion, that Debtor is not the same Patricia A. Tucker who owns real estate within Windrush Homeowners Association, known as 1616 Rockcress Drive, Jamison, 18929.

17. Denied. Based on Debtor's response to Movant's letter of March 30, 2023 (*Our office does not represent a Patricia A. Tucker on the claims asserted in your March 30th correspondence*), Movant was not advised that Debtor did not own the real estate within Windrush Homeowners Association, known as 1616 Rockcress Drive, Jamison,

18929. Based on Debtor's response to the Motion, in which Debtor for the first time advised Movant that she was not the same Patricia A. Tucker, Movant immediately withdrew its Motion for Relief.

WHEREFORE, Movant requests that Debtor's request for reimbursement of attorney's fees be denied.

Clemons Richter & Reiss, P.C.

A handwritten signature in blue ink, appearing to read "Stefan Richter", is written over a horizontal line.

Stefan Richter, Esquire
Attorney for Movant

Dated: May 11, 2023